

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

LOUISIANA HEALTH SERVICE & INDEMNITY  
COMPANY D/B/A BLUE CROSS AND BLUE  
SHIELD OF LOUISIANA, and HMO LOUISIANA,  
INC., on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,  
INC., JANSSEN RESEARCH & DEVELOPMENT,  
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO. 1:19-cv-00474

MAYOR AND CITY COUNCIL OF BALTIMORE,  
on behalf of itself and all others similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,  
INC., JANSSEN RESEARCH & DEVELOPMENT,  
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO.: 1:19-cv-00605

IRON WORKERS DISTRICT COUNCIL  
(PHILADELPHIA and VICINITY) HEALTH  
BENEFIT PLAN, on behalf of itself and all those  
similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,  
INC., JANSSEN RESEARCH & DEVELOPMENT,  
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO.: 1:19-cv-00642

KENTUCKY LABORERS DISTRICT COUNCIL  
HEALTH AND WELFARE FUND, on behalf of itself  
and all those similarly situated,

Plaintiffs,

v.

JANSSEN BIOTECH, INC., JANSSEN ONCOLOGY,  
INC., JANSSEN RESEARCH & DEVELOPMENT,  
LLC, and BTG INTERNATIONAL LIMITED,

Defendants

CIVIL ACTION NO.: 1:19-cv-00658

**PLAINTIFFS' MOTION FOR APPOINTMENT OF INTERIM COUNSEL FOR THE  
PROPOSED CLASS**

This motion seeks, pursuant to Federal Rule of Civil Procedure 23(g)(1) and (3), the appointment of interim co-lead counsel for the proposed class. This motion has the support of plaintiffs' counsel in all four cases, and counsel for the defendants have indicated that they take no position on the motion.<sup>1</sup>

In accordance with Federal Rules of Civil Procedure 23(g)(1) and 23(g)(3), counsel for plaintiffs Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana, HMO Louisiana, Inc., the Mayor and City Council of Baltimore, Iron Workers District Council (Philadelphia and Vicinity) Health Benefit Plan, and Kentucky Laborers District Council Health and Welfare Fund (Kentucky Laborers) hereby move for an order appointing interim co-lead counsel for the proposed class.

In support of this motion, the plaintiffs file herewith a memorandum of law and a proposed order.

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<sup>1</sup> This motion is being separately filed in each of the four related cases.

Dated: May 31, 2019

Respectfully submitted,

/s/William H. Monroe, Jr.

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*Counsel for Plaintiff Kentucky Laborers District  
Council Health and Welfare Fund and the Proposed  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 31, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record who have made a formal appearance.

Dated: May 31, 2019

**/s/ William H. Monroe, Jr.**

William H. Monroe, Jr. (VSB No. 27441)